

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

APR 10 2015

Clerk of Court

United States of America

v.

Case No. M-15-0551-M

Ricardo RODRIGUEZ-Padron

Mexican National

Year of Birth: 1991

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 10, 2015 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. § 841

Possession with intent to distribute approximately 20.48 kilograms, a
Schedule II Controlled Substance

21 U.S.C. § 952

Importation of approximately 20.48 kilograms, a Schedule II Controlled
Substance

This criminal complaint is based on these facts:

See attachment A.

☒ Continued on the attached sheet.Approved
Tough Leonard

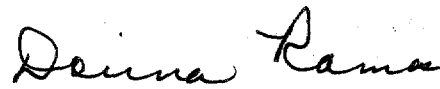
Complainant's signature

Ryan Browning, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

2/10/2015

Judge's signature

City and state:

McAllen, Texas

U.S. Magistrate Judge

Printed name and title

Dorina Ramis

Attachment A

The information in this affidavit is provided for the limited purpose of establishing probable cause. This information is not a complete statement of all the facts related to this case.

On April 10, 2015, Ricardo RODRIGUEZ-Padron applied for entry into the United States from the United Mexican States at the Pharr, Texas Port of Entry. RODRIGUEZ-Padron was the driver and sole occupant of a white Chrysler Sebring bearing Tamaulipas, Mexico license plate 457TPY3.

During the inspection of the vehicle, a narcotic detection dog alerted to the presence of narcotics near the rear of the vehicle. An intensified inspection of the gas tank by U.S. Customs and Border Protection Officers (CBPOs) resulted in the discovery of eighteen tape wrapped bricks concealed inside the tank. The eighteen packages were found to contain approximately 20.48 kilograms a white powder-like substance which field-tested positive for the properties of cocaine.

RODRIGUEZ-Padron was read his Miranda rights from a preprinted form in Spanish. RODRIGUEZ-Padron stated he understood his rights, waived his rights, and signed the pre-printed form. During the interview RODRIGUEZ-Padron stated he did know he was transporting an illegal narcotic. RODRIGUEZ-Padron stated he believed he was transporting marijuana or cocaine. RODRIGUEZ-Padron said that he was going to be paid \$1,00.00 (USD) after he successfully delivered the drugs in the United States.

The Assistant United States Attorney's Office in McAllen, Texas was briefed regarding the aforementioned facts and federal prosecution was accepted.